

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GEORGE HART,)	
)	No. 08 C 0761
Plaintiff,)	
)	JUDGE ST. EVE
v.)	
)	Magistrate Judge Brown
OFFICER RUSSELL E. WHITE, JR., #13770,)	
OFFICER JESUS CANO #13648,)	
OFFICER JEFFREY J. ZWIT, #10336, OFFICER)	
LUIS VEGA, #13853, and the CITY OF)	
CHICAGO,)	
)	
Defendants.)	

**STIPULATION TO ENTRY OF JUDGMENT
AGAINST DEFENDANT CITY OF CHICAGO**

Defendant City of Chicago hereby stipulates to the following:

1. Plaintiff George Hart has filed a First Amended Complaint against defendant City of Chicago and individual defendant Chicago Police Officers White, Cano, Zwit, and Vega. Plaintiff's First Amended Complaint includes various claims brought under federal and state law.

2. In Plaintiff's First Amended Complaint, Plaintiff claims that the individual defendant Chicago police officers violated his constitutional rights as a direct result of various policies, practices, and customs of the City of Chicago. Hence, Plaintiff has brought a *Monell* claim against the City.¹ In Plaintiff's First Amended Complaint, he seeks a judgment against the City for damages caused by the alleged violations of his rights under the Constitution.

¹ See *Monell v. Department of Social Services of City of New York*, 436 U.S. 658 (1978).

3. Without admitting Plaintiff's *Monell* allegations in his First Amended Complaint, the City of Chicago agrees to entry of judgment against the City for compensatory damages, and, to the extent allowed by the court, reasonable attorneys fees pursuant to 42 U.S.C. § 1988, if and only if the finder of fact in this case finds that any City of Chicago employee violated Plaintiff's constitutional rights as alleged in his First Amended Complaint. The entry of any judgment against the City pursuant to this stipulation is accepted by the City only to the extent that the judgment is affirmed after any post-trial motions and/or an appeal, if an appeal is taken.

MARA S. GEORGES
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By: /s/ Megan K. McGrath
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